

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

TRUSTEES OF THE SUBURBAN TEAMSTERS)	
OF NORTHERN ILLINOIS PENSION FUND)	
AND WELFARE FUNDS,)	
)	
Plaintiff,)	
)	No. 06 C 7039
v.)	
)	Judge Moran
)	
ROSELLE FARMERS LUMBER COMPANY)	Magistrate Judge Cole
an Illinois corporation, a/k/a ROSELLE LUMBER)	
COMPANY)	
)	
Defendant.)	

MOTION FOR JUDGMENT IN SUM CERTAIN

NOW COMES the Plaintiff, TRUSTEES OF THE SUBURBAN TEAMSTERS OF NORTHERN ILLINOIS WELFARE AND PENSION FUND, by and through its attorney, JOHN J. TOOMEY, ARNOLD AND KADJAN, and pursuant to FRCP 55 move for entry of a default judgment in sum certain as stated in this Complaint and the supporting Affidavits attached hereto. In support of its Motion, Plaintiffs state as follows:

1. Suit was filed on December 19, 2006 and an Amended Complaint was filed on January 17, 2007 for collection of delinquent contributions plus attorneys' fees, costs and interest under 29 U.S.C. 1132(g)(2).

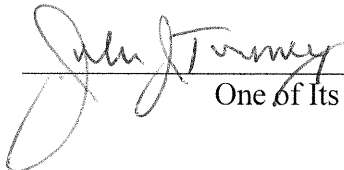
2. Service upon ROSELLE FARMERS LUMBER COMPANY, an Illinois corporation a/k/a ROSELLE LUMBER COMPANY was made on the Illinois Secretary of State on February 2, 2007, and a copy of the proof of service was filed with the court on February 6, 2007.

3. Defendant is now in default as to the Complaint and as supported by the attached Affidavits the sums due are:

\$4,646.55 Pension
\$13,218.51 Welfare
\$925.00 Attorneys fees
\$20.00 Court costs
\$18,810.06

WHEREFORE, Plaintiff prays for the entry of judgment against Defendants, ROSELLE FARMERS LUMBER COMPANY, an Illinois corporation a/k/a ROSELLE LUMBER COMPANY and in favor of Plaintiffs, TRUSTEES OF THE SUBURBAN TEAMSTERS OF NORTHERN ILLINOIS WELFARE AND PENSION FUNDS in the amount of \$18,810.06.

TRUSTEES OF THE SUBURBAN TEAMSTERS
OF NORTHERN ILLINOIS WELFARE AND
PENSION FUNDS

By:  _____
One of Its Attorneys

JOHN J. TOOMEY
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